

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

Adam Williams,

Plaintiff,

vs.

Tesla, Inc.; Tesla Motor, Inc.; Tesla, Inc. d/b/a  
Tesla Motors, Inc.; and John Does 1-5 and 6-10,

Defendants.

Case No. 1:18-cv-04120-JHR-AMD

**Via ECF**

**JOINT STIPULATION AND ORDER TO  
EXTEND THE BRIEFING SCHEDULE  
FOR DEFENDANT'S MOTION TO  
COMPEL ARBITRATION**

The parties to this action, Plaintiff Adam Williams ("Plaintiff") and Defendant Tesla, Inc.<sup>1</sup>, by and through their respective counsel of record, hereby stipulate to the following and request that their stipulation become an Order of this Court:

1. Plaintiff initiated this action in the Superior Court of New Jersey on or about January 27, 2018. Defendant was served with a Summons and a copy of the Complaint on February 21, 2018. Defendant removed to this Court on March 23, 2018. (ECF 1).

2. On April 13, 2018, Defendant filed a Motion to Compel Arbitration. (ECF 6).

3. Counsel for Plaintiff Williams requested and was granted an extension of time to file an opposition to Defendant's Motion under Local Rule of Civil Procedure 7.1. (ECF 7). The return date for the Motion was reset to May 21, 2018, with Plaintiff's Opposition due on May 7, 2018 and Defendant's Reply due on May 14, 2018.

4. By letter filed May 3, 2018, counsel for Plaintiff Williams presented a consent Order from both parties for an additional extension for the Court's consideration. The consent

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<sup>1</sup> The only proper defendant in this matter is Tesla, Inc. Tesla Motor, Inc. underwent a corporate name change and is now Tesla, Inc. References to Tesla throughout this Memorandum of Law include Defendants Tesla, Inc.; Tesla Motor, Inc.; and Tesla Inc. d/b/a Tesla Motor, Inc.

Order proposed that Plaintiff's Opposition be filed on or before May 21, 2018, and Defendant's Reply filed on or before June 4, 2018. (ECF 10).

5. The consent Order was not entered. Plaintiff filed his Opposition to Defendant's Motion to Compel on May 16, 2018. (ECF 11).

6. The parties conferred and counsel for Plaintiff Williams joins this request to set the due date for Defendant's Reply in support of its Motion to Compel Arbitration as June 4, 2018. This request is made as a result of the undersigned counsel's prescheduled vacation plans.

7. Based upon these representations, the parties request that this Court enter an Order approving this Joint Stipulation and Order to extend the briefing schedule for Defendant's Motion to Compel Arbitration.

SO STIPULATED:

/s/ Toni L. Telles

Toni L. Telles, Esq.  
Law Offices of Eric A. Shore  
4 Echelon Plaza, 8th Floor  
201 Laurel Road  
Voorhees, NJ 08043

*Attorneys for Plaintiff Adam Williams*

/s/Alexa J. Laborda Nelson

Alexa J. Laborda Nelson  
Matthew J. Hank  
LITTLER MENDELSON, P.C.  
Three Parkway  
1601 Cherry Street, Suite 1400  
Philadelphia, PA 19102

*Attorneys for Defendants Tesla, Inc.; Tesla Motor, Inc.; Tesla, Inc. d/b/a Tesla Motors, Inc.*

Dated: May 22, 2018

SO ORDERED:

Dated:

The Honorable Joseph H. Rodriguez, U.S.D.J.